

EXHIBIT 5

MOTION TO REOPEN CHAPTER 7 CASE FOR THE PURPOSE OF
DISCLOSING PREPETITION CLAIM

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	
)	CASE NO. 21-55658-sms
Roger Dale Parker,)	
)	CHAPTER 7
<u>Debtor.</u>)	

**MOTION TO REOPEN CHAPTER 7 CASE FOR THE PURPOSE OF DISCLOSING
PREPETITION CLAIM**

COMES NOW THE DEBTOR in the above-styled Chapter 7 case, by and through counsel, and files this “Motion to Reopen Chapter 7 Case for the Purpose of Disclosing Prepetition Claim”, showing to this Court the following:

1.

This Court has jurisdiction in this matter pursuant to 28 U.S.C. Section 1334, 28 U.S.C. Section 151, and 28 U.S.C. Section 157.

2.

This Court is the proper venue for this matter pursuant to 28 USC Section 1409.

3.

This matter is a core proceeding within the contemplation of 28 U.S.C. Section 157.

4.

This instant Chapter 7 case was filed on July 29, 2021.

5.

After Debtor received his discharge, he was made aware of a potential claim against a former employer/contractor (Perdue Foods, LLC) that arose prior to the filing of his Chapter 7.

6.

The Debtor's case was discharged and closed February 2, 2022.

7.

The Debtor would like to make amendments to Schedules A/B and C to disclose this claim and exempt the proceeds as appropriate.

8.

The Debtor had no knowledge of this claim prior to the filing of this case or before the discharge. It is in the best interests of both the Debtor and the Estate that this Chapter 7 Case be reopened for the purpose disclosing this claim and having it administered appropriately by the Chapter 7 Trustee.

WHEREFORE, Debtor prays:

- (a) That this Motion be filed, read, and considered;
- (b) That this Honorable Court grant this Motion; and,
- (c) That this Honorable Court grant such further relief as it may deem just and proper.

Respectfully submitted,

/s/

J. Keith Cornwell
GA Bar No. 940503
Attorney for Debtor
Cherney Law Firm, LLC
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(404) 791-4449

CERTIFICATE OF SERVICE

This is to certify under penalty of perjury that I am over the age of 18 and that on this day I served the following parties with a copy of the attached pleadings by placing true copies of same in the United States Mail with adequate postage affixed to insure delivery, addressed to:

John Lewis, Jr.
Suite 1200
1230 Peachtree Street
Atlanta, GA 30309

Roger Dale Parker
259 Black Road
Abbeville, SC 29620

(Plus to all Creditors on the attached Creditor Mailing Matrix)

This the 12th day of June, 2025.

/s/
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Attorney for Debtor
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Label Matrix for local noticing
113E-1
Case 21-55658-sms
Northern District of Georgia
Atlanta
Thu Jun 12 11:56:59 EDT 2025

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Frost - Arnett Company
The Collection Company
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Nashville, TN 37219-8988

Georgia Department of Revenue
ARCS - Bankruptcy
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John Lewis Jr.
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